

# RAY PROPERTIES, INC.

5840 Red Bug Lake Rd.  
PMB 290  
Winter Springs, FL 32708

Voice: 321 280 6872  
keith@keithray.com

Via email: [BSheahan@lakecountyfl.gov](mailto:BSheahan@lakecountyfl.gov)

September 13, 2013

Mr. Brian Sheahan, Director  
Planning and Community Design Division  
Lake County Government  
Growth Management Department  
315 West Main Street  
P.O. Box 7800  
Tavares, FL 32778

RE: Pacific Ace Corporation Property Alternate Key 1412366 et al

Dear Mr. Sheahan:

The purpose of this letter is to provide input from Pacific Ace Corporation on the 8/23/13 draft of the Wellness Way Sector Plan (WWSP).

Per our previous correspondence, you have indicated that the County's intent is that any property within the WWSP boundary that has an existing PUD may choose to proceed through the development process either under the terms of the PUD or to opt for the possibility of additional development intensities that may be authorized by the WWSP. Pacific Ace Corporation does not believe that the current language in the WWSP, see Page 21 of the WWSP and Policies 1-8.1.8.1 and 1-8.1.8.7, is adequate to ensure this right to choose. Pacific Ace therefore requests that the final adopted version of the WWSP include much more specific language stating that any property with an existing PUD may be developed under the criteria of the PUD, without being a part of a Detailed Specific Area Plan of any size.

Similarly, Pacific Ace Corporation requests that specific language be added stating that the suspension of development due to the jobs-to-housing ratio does not apply to any land with an existing PUD, see Policy 1-8.1.8.8.

In addition, Pacific Ace has the following comments regarding the overall plan. The research regarding the statistical analysis of employment growth opportunities is excellent. However, the conclusions include several short-comings.

- First and foremost, the WWSP admits that it has estimated the potential job growth for the County for the next 30 years and has allocated all of this land to the WWSP area. This is not rational; jobs will certainly occur elsewhere in the County, and therefore, the amount of land allocated to employment uses within the WWSP area is excessive.
- This excess is exacerbated by the fact that the projected intensity for these new jobs is based upon the current “sprawl” model of existing development rather than the compact growth that the WWSP wishes to accomplish. The result of these two decisions is that a) “bits and pieces” of employment type uses will occur throughout the areas designated for employment but few of these nodes will be able to develop the form and intensity desired by the WWSP, and b) the most likely way that the +/- 7,000 acres of land designated for employment will be used is for large-scale industrial uses, which, in general are not beneficial to the overall quality of life of the County residents.
- Despite purporting to do otherwise, the analysis doesn't really focus on what jobs are best for the long-term future of the County. For example, mining should only be considered as an allowable use to the extent necessary to serve local needs and thus to reduce transportation impacts (congestion and pollution). When that role is fulfilled, the mining land needs to be restored and restricted to other uses.

Please contact me if I can provide any additional information or clarify these comments in any way.

Sincerely,  
**Ray Properties, Inc.**

Keith Ray